

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

v.

\$6,152,285.88 IN UNITED STATES
CURRENCY FORMERLY ON DEPOSIT AT
FIRST BANK OF DELAWARE,
PHILADELPHIA, PENNSYLVANIA,
IN ACCOUNT NUMBERED 9016139,

Defendant-in-rem.

15 CV 02237 (KMW/KNF)

**VERIFIED CLAIM OF ULTRA SAFE
PAY, LLC**

PLEASE TAKE NOTICE that Ultra Safe Pay, LLC, pursuant to 18 U.S.C. § 983(a)(4) and Rule G(5)(a), Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, by and through its attorneys, hereby asserts an ownership interest in, and makes a claim upon, the following property identified by the United States as a defendant *in rem* in the above-captioned case:

\$6,152,285.88 in United States Currency Formerly on Deposit at
First Bank of Delaware, Philadelphia, Pennsylvania, in Account
Numbered 9016139.

Ultra Safe Pay, LLC claims a right, title and interest in the above identified
defendant *in rem* as an owner.

Dated: May 4, 2015

/s/ Adam B. Michaels
Adam B. Michaels
PEPPER HAMILTON LLP
The New York Times Building
620 Eighth Avenue
New York, NY 10018-1405
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Attorneys for Claimant Ultra Safe Pay, LLC

VERIFICATION

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

ULTRA SAFE PAY, LLC

by 
Manuel Sanchez, its Authorized Representative